

**REMARKS**

Claims **1-3, 5-12** and **14-24** are pending.

Claims **4** and **13** are canceled.

Claims **1-3, 5-12** and **14-24** stand rejected.

Claims **1, 10** and **19** have been amended. No new matter has been added.

Support for the amendments can be found, at least, within paragraphs [0013]-[0016] of the originally-filed specification.

**Rejection of Claims under 35 U.S.C. §103**

Claims 1, 10, and 19 stand rejected under 35 U.S.C. 103(a) as purportedly being unpatentable over U.S. Patent No. 7,099,350 (“Peterson”) in view of U.S. Patent Publication No. 2002/0095456 A1 (“Wensheng”). Applicants respectfully traverse this rejection.

Applicants respectfully submit that neither Peterson nor Wensheng, alone or in any combination, teach or suggest, at the very least, that an aspect of employee management on a target system is updated according to employee position data imported from a source system. This newly added limitation is in claim 1, and similar limitations are in claims 10 and 19.

Peterson is cited as purportedly teaching the previously and currently claimed limitations covering “synchronizing”, “extracting”, and “converting.” *See* Office Action, pp. 2-5. Notwithstanding other deficiencies of the Office Action’s position, Applicants respectfully submit that Peterson fails to teach or in any way suggest the teachings of features in any way comparable to the newly recited limitations, as well as the existing limitations. Peterson simply focuses on transferring data from one database structure to another database structure. *See* Peterson, Abstract and 3:15-30. In other words, both of the computer systems in Peterson are similar, and the only thing necessary is to simply copy data from a field in one database structure into that of another database structure. Peterson fails to contemplate the substantially more complicated scenario addressed by the claimed invention – one in which a source system maintains one aspect of employee position data and a target system maintains a different aspect of the employee position data.

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By marked contrast to the references, the claimed source system may be a back-office human resources management (HRM) system and the claimed target system may be a front-office employee resource management (ERM) system. In this case, the back-office HRM system maintains employee position data and the front-office ERM system maintains an organizational hierarchy that is updated according to the employee position data received from the back-office HRM system. Thus, the claimed method of managing data enables a more complicated interaction between two systems that are responsible for the management of different aspects of employee position data, reflecting their differing responsibilities as to the management of the employees themselves.

Wensheng is introduced solely for the concept of importing data into a field, and nothing more. *See Office Action*, p. 4. Notwithstanding other infirmities of the Office Action’s position on Wensheng, Applicants respectfully submit that the newly claimed “updating” limitation is far removed from simply importing data into a field. Wensheng is completely silent on any concepts even remotely comparable to a source system maintaining one aspect of the employee position data and a target system maintaining a different management aspect, particularly where the aspect of the employee position data on the target system is updated according to the aspect of employee position data on the source system.

The Office Action notes that neither Peterson nor Wensheng disclose the claimed “employee position data.” *See Office Action*, p. 4. However, contrary to the Office Action’s position that the employee position data is nonfunctional descriptive material, the claimed updating would not be possible without the characteristics particular to employee position data. For example, because the claimed method uses employee position data, the source system can simply maintain employee position data as a list of employees with their respective position information, while the target system can build an organizational hierarchy derived using the employee position data. If the claimed employee position data were a nullity, the target system would be unable to perform the claimed update. Thus, the fact that neither Peterson nor Wensheng, alone or in combination, contemplate anything like the claimed employee position data completely prevents either reference from teaching or even suggesting the claimed limitations that make use of employee position data.

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Claims 2 and 11 stand rejected under 35 U.S.C. 103(a) as purportedly being unpatentable over Peterson in view of Wensheng and further in view of U.S. Patent Application Publication No. 2003/0229529 A1 (“Mui”). Applicants respectfully traverse this rejection.

Claims 2 and 11 depend on claim 1, and Applicants respectfully submit that these claims are in condition for allowance for at least the foregoing reasons set forth with respect to the claim 1. Applicants therefore respectfully request the Examiner’s reconsideration and withdrawal of the rejections to these claims.

Claims 3 and 12 stand rejected under 35 U.S.C. § 103(a) as purportedly being unpatentable over Peterson in view of Wensheng and further in view of U.S. Patent No. 6,996,776 B1 (“Makely”) in further view of Mui. Applicants respectfully traverse this rejection.

Claims 3 and 12 depend on claims 1 and 10, respectively, and Applicants respectfully submit that these claims are in condition for allowance for at least the foregoing reasons set forth with respect to claims 1 and 10. Applicants therefore respectfully request the Examiner’s reconsideration and withdrawal of the rejections to these claims.

Claims 5-9, 14-18 and 20-24 stand rejected under 35 U.S.C. § 103(a) as purportedly being unpatentable over Peterson in view of Wensheng and in further view of U.S. Patent Publication No. 2004/0093351 A1 (“Lee”). Applicants respectfully traverse this rejection.

Claims 5-9 depend on claim 1; claim 14-18 depend on claim 10; and claims 20-24 depend on claim 19. Applicants respectfully submit that these dependent claims in condition for allowance for at least the foregoing reasons set forth with respect to the independent claims. Applicants therefore respectfully request the Examiner’s reconsideration and withdrawal of the rejections to these claims.

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**CONCLUSION**

In light of the amendments and remarks set forth herein, this application is believed to be in condition for allowance. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

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